

EXHIBIT 12

(UNITED STATES' PROPOSED REDACTIONS)

From: [REDACTED] (NHTSA) [REDACTED]
 To: [REDACTED] (NHTSA)
 Sent: 11/19/2020 8:08:01 AM
 Subject: ODI and Air Bag Recalls Campaign Performance Reports (Sept. 2019-Nov. 2020)
 Attachments: Final Air Bag Recalls Full Campaign Performance Report (September 2019 - November 2020).pdf; Final ODI Recalls Full Campaign Performance Report (September 2019 - November 2020).pdf

[REDACTED]

Please see attached air bags and recalls campaigns reports from September – November 2020. Both continued to perform well with the air bags campaign converting over 776K times (use of VIN Look-Up Tool) and recalls campaign delivering Over 1.5M conversions.

Here are some additional analyses on the two campaigns.

Overall, both campaigns continued to perform well after relaunching in early July. Since launching in September 2019, the ODI Recalls campaign drive 1,692,172 clicks and garnered 157,616,301 impressions. The average cost-per-click (CPC) was \$0.46, and the average cost-per-acquisition (CPA) was \$0.50. In addition, the campaign drove 1,564,143 conversions.

CPC remained extremely efficient throughout the year, driven primarily by search, despite the COVID-19 pandemic. Following the relaunch of the campaign in July, clicks and CTR remained low, which is likely due to the pandemic. People have been using their cars less and feel less urgency to bring their cars in for repair.

Search delivered an above-average CTR of 15.61% and the most efficient CPC across all channels at \$0.29. Search also delivered the highest number of conversions with 969,832. For Display, the "Recall C" creative generated the highest number of total conversions (159,262) and had the lowest CPC (\$0.72). The "Hour Glass" and "Don't Wait" creative was rotated into the buy when it relaunched in July, which explains the lower amount of impressions compared to Recall B and Recall C.

The Air Bag Recalls campaign drove 820,627 clicks and garnered 240,808,366 impressions since launching in September. The campaign also drove 776,968 conversions, and the overall CPA was \$1.39. The average CPC was \$1.31, a \$0.06 increase since the last report. All mediums delivered above the CTR benchmark. Search delivered a CTR of 10.54% and the most efficient CPC across all channels at \$0.56.

Display achieved the highest numbers of conversions at 444,363. For Display, the "Ominous Concept" creative generated the most direct conversions (8,723) and impressions (48,303,107), and the highest CTR (0.19%). We recommend consolidating to programmatic display (DV360) as it is the most efficient and effective platform in driving conversions.

Let me know if you have any questions on these reports.

[REDACTED]
 Marketing Specialist
 National Highway Traffic Safety Administration (NHTSA)
 [REDACTED]

Sep 11, 2019 - Nov 8, 2020

Campaign Objective: Deliver engagement with the buttons on the "Safety Issues & Recalls" page

Main KPI: Total Campaign Page (CP) button conversions

Clicks on the "Year Make Model" search button

Clicks on the "Vehicle Identification Number (VIN)" search button

Summary

Clicks
820,627

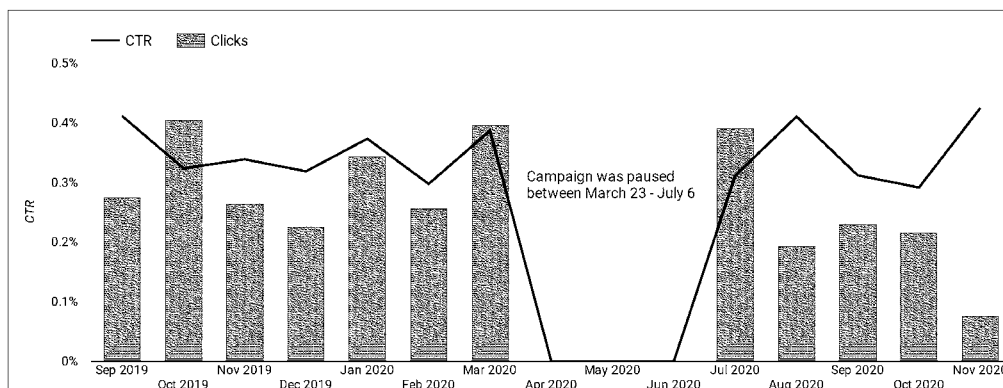
Impressions
240,808,366

CPC
\$1.31

Conversions
776,968

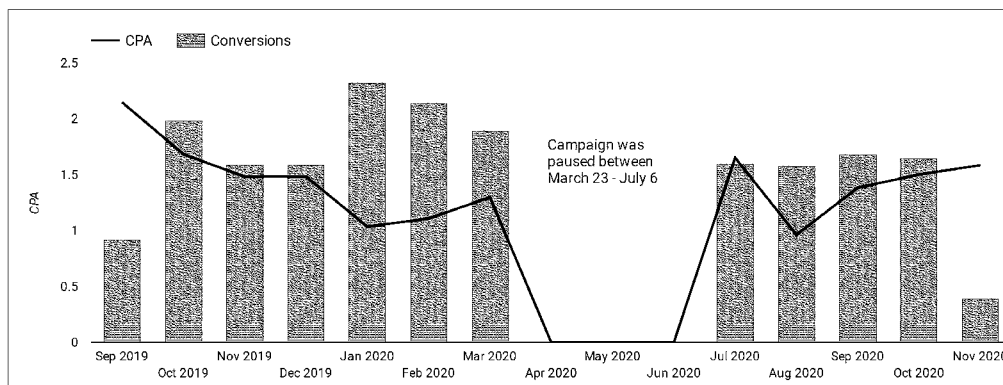
CPA
\$1.39

CTR vs Clicks



Year Month	CTR	Clicks
Sep 2019	0.41%	69,014
Oct 2019	0.32%	101,273
Nov 2019	0.34%	66,236
Dec 2019	0.32%	56,700
Jan 2020	0.37%	86,252
Feb 2020	0.3%	64,309
Mar 2020	0.39%	99,236
Jul 2020	0.31%	98,088
Aug 2020	0.41%	48,403
Sep 2020	0.31%	57,541
Oct 2020	0.29%	54,234
Nov 2020	0.42%	19,341

CPA vs Conversions



Year Month	CPA	Conversions
Sep 2019	\$2.15	36,836
Oct 2019	\$1.68	79,617
Nov 2019	\$1.48	63,832
Dec 2019	\$1.48	63,810
Jan 2020	\$1.03	93,428
Feb 2020	\$1.11	85,866
Mar 2020	\$1.3	76,267
Jul 2020	\$1.65	64,022
Aug 2020	\$0.96	63,517
Sep 2020	\$1.38	67,654
Oct 2020	\$1.5	66,222
Nov 2020	\$1.58	15,897

Performance by Medium

Medium	Impressions	Clicks	CTR	CPC	Investment	CPA	Conversions
Display	216,608,809	366,726	0.17%	\$1.91	\$700,321.53	\$1.58	444,363
Facebook	22,869,914	313,745	1.37%	\$0.96	\$299,998.8	\$1.28	233,897
Search	1,329,643	140,156	10.54%	\$0.56	\$78,063.51	\$0.79	98,708
Grand total	240,808,366	820,627	0.34%	\$1.31	\$1,078,383.84	\$1.39	776,968

*Standard Display CTR benchmark-0.05-0.08%; Social CTR benchmark - 0.75-1.00%; Search CTR 1-2%

Performance Highlights

- Since the campaign launched in September 2019, it has delivered over 240 million impressions and 820,627 clicks to the landing page, producing a click-through-rate (CTR) of 0.34% and a cost-per-click (CPC) of \$1.31, a \$0.06 increase since the last report. All mediums delivered above their respective CTR benchmarks. This campaign was paused from March 23 - July 6, 2020.
- Overall, the campaign generated 776,968 total campaign page button conversions, for an average cost-per-acquisition (CPA) of \$1.39.
- Search delivered an above-average click-through-rate (CTR) at 10.54% and the most efficient CPC across all channels of \$0.56.
- Display achieved the highest number of conversions (444,363), followed by Facebook (233,897).

Sep 11, 2019 - Nov 8, 2020

Display Platform

Platform ▾	Clicks	Impressions	CTR	CPC	Investment	CPA	Indirect conversions	Direct conversions	Direct Conversion Rate
GDN	274,736	117,750,961	0.23%	\$1.01	\$277,333.82	\$1.56	148,841	28,887	10.51%
Digilant	30,624	40,408,145	0.08%	\$6.53	\$199,999.87	\$3.48	56,807	613	2.00%
DV360	61,366	58,449,703	0.10%	\$3.63	\$222,987.85	\$1.07	204,206	5,009	8.16%
Grand total	366,726	216,608,809	0.17%	\$1.91	\$700,321.53	\$1.58	409,854	34,509	9.41%

*Indirect Conversion Rate refers to when an ad is seen and then the user converts on the landing page (engages with recall tools) later within a 90-day window. Direct Conversions occur when the ad is clicked on and immediately the user engages with the recall's tools.

Display Creative

Creative Name ▾	Clicks	Impressions	CTR	CPC	Investment	CPA	Indirect conversions	Direct conversions	Direct Conversion Rate
Wheel Risk	66,448	42,822,779	0.16%	\$2.03	\$134,561.36	\$1.40	87,734	8,644	13.01%
Ominous Concept	93,749	48,303,107	0.19%	\$1.64	\$153,791.44	\$1.59	88,075	8,723	9.30%
Icon Concept A	78,875	45,954,379	0.17%	\$1.89	\$149,222.78	\$1.68	83,438	5,315	6.74%
Dummy Concept	91,041	48,011,541	0.19%	\$1.70	\$155,020.27	\$1.61	88,224	8,228	9.04%
Bomb On Board	36,613	31,517,003	0.12%	\$2.94	\$107,725.69	\$1.63	62,383	3,599	9.83%
Grand total	366,726	216,608,809	0.17%	\$1.91	\$700,321.53	\$1.58	409,854	34,509	9.41%

Display Performance Summary

- The display portion of the campaign returned 34,509 conversions (direct conversions only) for a direct conversion rate of 9.41%.
- Display also drove over 216 million impressions and returned an overall CTR of 0.17%. This is above the display CTR benchmark of 0.05-0.08%.
- GDN generated the most direct conversions (28,887) and well as the lowest CPC (\$1.01). However, DV360 drove the most efficient CPA (\$1.07).
- Digilant continued to under-perform compared to other platforms in terms of cost efficiency. Following the conclusion of this campaign, we recommend consolidating to programmatic display (DV360) as it is the most efficient and effective platform in driving conversions.

Creative Performance

- "Ominous Concept" has achieved the most direct conversions (8,723) and impressions (48,303,107), and the highest CTR (0.19%).

Facebook Audience

Audience ▾	Clicks	Impressions	CTR	CPC	Investment	CPA	Indirect conversions	Direct conversions	Direct Conversion Rate
Parents of Teens	74,877	5,385,060	1.39%	\$1.00	\$75,006.98	\$1.34	2,874	53,225	71.08%
Parents of Children	71,630	5,306,367	1.35%	\$1.05	\$74,999.89	\$1.45	2,668	49,088	68.53%
Car Owner	84,134	6,070,781	1.39%	\$0.89	\$74,993.54	\$1.19	2,549	60,384	71.77%
Car Buyer	83,104	6,107,706	1.36%	\$0.90	\$74,998.39	\$1.18	2,945	60,910	73.29%
Grand total	313,745	22,869,914	1.37%	\$0.96	\$299,998.8	\$1.28	11,036	223,607	71.27%

Facebook Creative

Creative ▾	Clicks	Impressions	CTR	CPC	Investment	CPA	Indirect conversions	Direct conversions	Direct Conversion Rate
Wheel Risk	19,029	2,250,920	0.85%	\$1.40	\$26,698.22	\$2.09	190	12,778	67.15%
Ominous Concept	21,133	1,829,733	1.15%	\$1.33	\$28,079.56	\$1.73	1,290	14,944	70.71%
Icon Concept A	76,937	4,816,070	1.60%	\$0.95	\$73,366.80	\$1.23	3,676	55,983	72.76%
Dummy Concept	81,698	6,109,887	1.34%	\$1.08	\$88,247.48	\$1.22	5,324	66,815	81.78%
Bomb On Board	114,948	7,863,304	1.46%	\$0.73	\$83,606.74	\$1.14	556	73,087	63.58%
Grand total	313,745	22,869,914	1.37%	\$0.96	\$299,998.80	\$1.28	11,036	223,607	71.27%

Facebook Performance Summary

- The Facebook portion of this campaign served over 22 million impressions, with 313,745 clicks to the landing page. This led to 223,607 direct conversions for a direct conversion rate of 71.27% and a CPA of \$1.28.
- With 60,910 direct conversions, the "Car Buyer" audience was responsible for the greatest number of Facebook conversions.
- The "Bomb On Board" creative produced the most conversions (73,087 direct conversions). However, the "Dummy Concept" creative had the highest conversion rate at 81.78%.
- In terms of geographic performance, Texas had the most direct conversions and the highest conversion rate.

Sep 11, 2019 - Nov 8, 2020

Search Campaign Summary

Clicks	Avg CPC	CTR	Impressions	Conversions	Cost
140,156	\$0.56	10.54%	1,329,643	98,708	\$78,063.51

Ad Group Performance

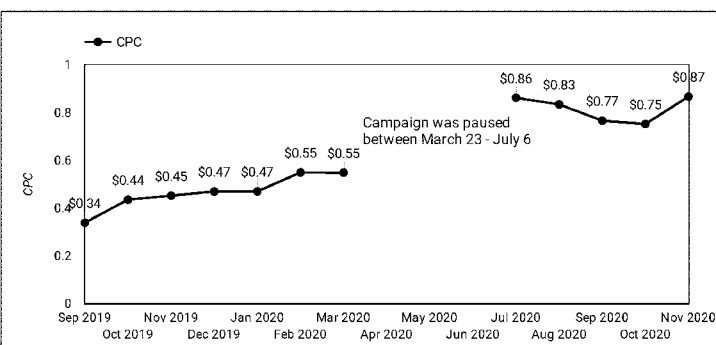
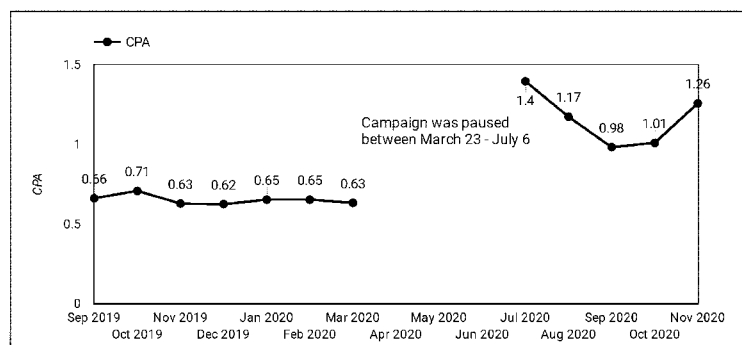
Ad group	Clicks ▾	Avg CPC	CTR	Impressions	Cost	Search impr share
Airbag Honda	19,631	\$1.26	7.02%	279,480	\$24,690.99	54.98%
Check Airbag	17,443	\$0.35	13.57%	128,588	\$6,095.66	46.55%
Recall Models	12,429	\$0.39	19.92%	62,399	\$4,876.00	46.88%
Airbag	12,151	\$0.56	15.68%	77,518	\$6,776.83	47.42%
Takata Toyota	11,985	\$0.43	15.14%	79,143	\$5,131.53	35.46%

Keyword Performance

Keyword	Ad group	Clicks ▾	Avg CPC	CTR	Impressions	Cost	Search impr share
airbag recall check	Check Airbag	13,294	\$0.32	16.25%	81,830	\$4,231.4	54.99%
defective airbags	Airbag	9,618	\$0.56	20.12%	47,807	\$5,414.91	50.91%
car airbag recall	Car Airbag	7,686	\$0.34	12.7%	60,498	\$2,579.73	27.82%
takata airbag toyota	Takata Toyota	7,257	\$0.42	14.84%	48,895	\$3,020.29	35.25%
recall airbag honda	Airbag Honda	6,986	\$1.28	9.5%	73,506	\$8,943.8	51.88%
nhtsa airbag recall	Nhtsa	5,875	\$0.1	19.42%	30,258	\$578.88	55.59%
airbag recall list	Airbag List	5,543	\$0.26	22.62%	24,506	\$1,441.97	30.38%
airbag recall models	Recall Models	4,410	\$0.37	20.36%	21,663	\$1,612.46	48.49%
ford airbag recall	Ford Airbag	4,192	\$0.47	12.28%	34,147	\$1,963.48	29.72%
takata airbag recall models	Recall Models	3,875	\$0.36	25.62%	15,124	\$1,411.51	59.19%

Ad Performance

Headline 1	Headline 2	Description	Ad group	Clicks ▾	Avg. CPC	CTR	Impr.	Cost
{Keyword:Auto Safety Recalls}	Check for Recalls. Save Lives.	Official Gov't Site For Vehicle Safety Recall Info. Learn More Now!	Airbag	5,328	\$0.42	29.66%	17,962	\$2,250.74
{Keyword:Auto Safety Recalls}	Check for Recalls. Save Lives.	Official Gov't Site For Vehicle Safety Recall Info. Learn More Now!	Recall Models	4,675	\$0.31	30.54%	15,310	\$1,460.98
{Keyword:Auto Safety Recalls}	Check for Recalls. Save Lives.	Official Gov't Site For Vehicle Safety Recall Info. Learn More Now!	Airbag List	3,824	\$0.21	35.36%	10,815	\$792.24
{Keyword:Auto Safety Recalls}	Check for Recalls. Save Lives.	Official Gov't Site For Vehicle Safety Recall Info. Learn More Now!	Car Airbag	3,178	\$0.31	21.48%	14,792	\$972.58
{Keyword: Vehicle Recall}	Check for Recalls. Save Lives.	Official Gov't Site For Vehicle Safety Recall Info. Learn More Now!	Airbag Honda	2,641	\$0.98	11.36%	23,247	\$2,587.10
{Keyword: Vehicle Recall}	Check for Recalls. Save Lives.	Official Gov't Site For Vehicle Safety Recall Info. Learn More Now!	Takata Injuries	2,090	\$0.39	27.44%	7,618	\$818.00
{Keyword:Auto Safety Recalls}	Safe Cars Save Lives	Use your VIN number to see if your vehicle has a recall. Learn more.	Check Airbag	1,665	\$0.23	26.54%	6,274	\$375.07
{Keyword:Auto Safety Recalls}	Check for Recalls. Save Lives.	Official Gov't Site For Vehicle Safety Recall Info. Learn More Now!	Check Airbag	1,616	\$0.22	26.77%	6,036	\$347.68
{Keyword: Vehicle Recall}	Check for Recalls. Save Lives.	Official Gov't Site For Vehicle Safety Recall Info. Learn More Now!	Have Airbag	1,519	\$0.34	30.56%	4,970	\$517.66
{Keyword: Vehicle Recall}	Safe Cars Save Lives	Use your VIN number to see if your vehicle has a recall. Learn more.	Ford Airbag	1,137	\$0.39	20.41%	5,570	\$438.36





Sep 11, 2019 - Nov 8, 2020

Search Campaign Overview

GMMB managed the Air Bag Recall Search Campaign from September 2019 - November 8, 2020 for a total spend of \$78,063.51. This campaign was paused on March 23rd and resumed on July 6th. Air Bag Recall ads on Google targeted appropriate keywords to drive traffic to: <https://www.nhtsa.gov/recalls>

Search Campaign Results

The campaign drove 140,156 clicks to the website while garnering 1,329,643 impressions. The average click-through-rate (CTR) was 10.54%, a slight increase of 0.05% month-over-month. However, this is still an extremely high CTR (the industry benchmark is 1-2%). The cost-per-click (CPC) increased slightly to \$0.56. Overall, the campaign drove 98,708 conversions, leading to a conversion rate of 70.43%. The average CPA increased to \$0.79.

Due to the COVID-19, pandemic, it's likely that drivers are commuting less and using their vehicles less often. This could promote a reduced urgency to research recalls causing an increase in CPC and CPA.

Keyword "airbag recall check" drove the vast majority of clicks with 13,294. The next highest number of clicks came from "defective airbags" which drove 9,618 clicks. Notably, two of the top three keywords in terms of clicks included the term "airbag recall," which indicates a high level of awareness among searchers for recall resources available on the NHTSA website.

Search Cumulative Performance

Clicks: 140,156

Impressions: 1,329,643

CTR: 10.54%

Average CPC: \$0.56

Conversions: 98,708

Conversion Rate: 70.43%

CPA: \$0.79

Total Cost: \$78,063.51

Sep 11, 2019 - Nov 8, 2020

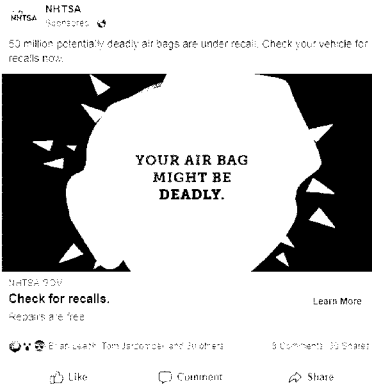


NHTSA
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION

Creative Samples

Icon Concept A

Facebook

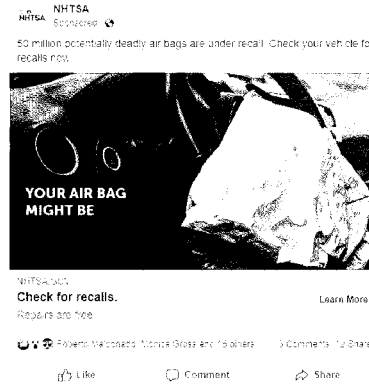


Display



Ominous Concept

Facebook

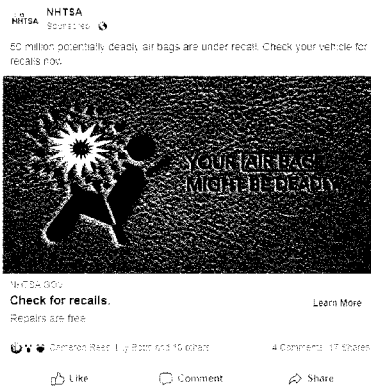


Display

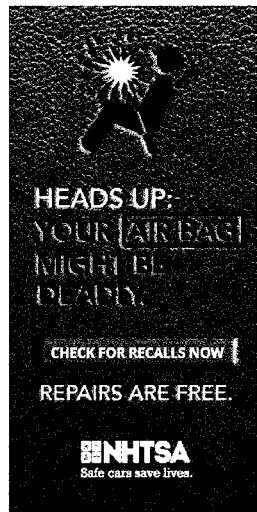


Dummy Concept

Facebook

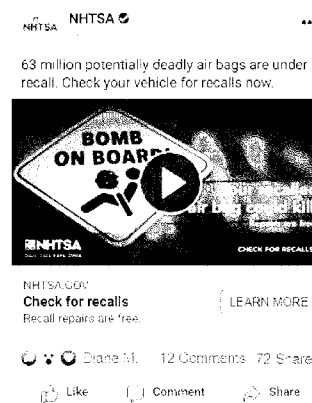


Display



Bomb on Board

Facebook

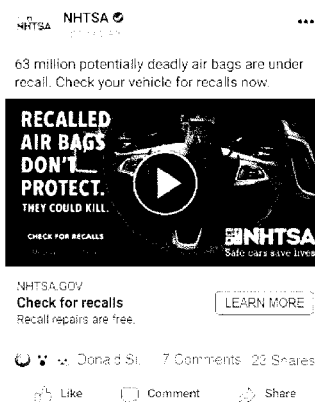


Display



Wheel at Risk

Facebook



Display

